

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**  
*Wilkes-Barre Division*

IN RE:  
JOHN JOSEPH LAWRENCE

Case No. 5:21-bk-00294-RNO  
Chapter 13

PHH Mortgage Corporation,  
Movant

vs.

JOHN JOSEPH LAWRENCE,  
Debtor

**OBJECTION TO CONFIRMATION  
OF DEBTOR'S CHAPTER 13 PLAN**

PHH Mortgage Corporation ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtor's Chapter 13 Plan* (Doc 7), and states as follows:

1. The Debtor filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on February 15, 2021.
2. Movant holds a security interest in the Debtor's real property located at 112 Oak Rd, Newfoundland, PA 18325 (the "Property"), by virtue of a Mortgage which is recorded in Instrument Number 201700009930 in Official Records of Pike County, Pennsylvania. Said Mortgage secures a Note in the amount of \$131,175.00.
3. The Debtor filed a Chapter 13 Plan (the "Plan") on February 15, 2021 (Doc 7).
4. Movant filed a Proof of Claim in this case on March 22, 2021 (Claim No. 2).
5. Movant objects to the Plan as the Plan does not provide for treatment of Creditor's claim.

**WHEREFORE**, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/ Mario Hanyon

Mario Hanyon

(Bar No. 203993)

Attorney for Creditor

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**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing Objection To Confirmation Of Debtor's Chapter 13 Plan has been electronically served or mailed, postage prepaid on April 22, 2021 to the following:

JOHN JOSEPH LAWRENCE  
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Hummelstown, PA 17036

Asst. U.S. Trustee  
United States Trustee  
228 Walnut Street, Suite 1190  
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/s/ Mario Hanyon  
Mario Hanyon  
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